

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In Re:  THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO  As representative of  THE COMMONWEALTH OF PUERTO RICO, et al  Debtors	PROMESA  TITLE III  Case No. 17-BK-3283-LTS  (Jointly Administrated)
In Re:  THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO  As representative of  PUERTO RICO ELECTRIC POWER AUTHORITY,  Debtor	PROMESA  Title III  Case No. 17-BK-4780-LTS  This Application relates only to PREPA, and shall be filed in the lead Case No. 17-BK-3283-LTS and PREPA's Title III case (Case No. 17-BK-4780-LTS)

MOTION BY CENTRO UNIDO DE DETALLISTAS (CUD); CAMARA DE  
MERCADEO, INDUSTRIA Y DISTRIBUCION DE ALIMENTOS (MIDA);  
ASOCIACIÓN DE CONTRATISTAS Y CONSULTORES DE ENERGÍA  
RENOVABLE DE PUERTO RICO (ACONER) AND PUERTO RICO  
MANUFACTURERS ASSOCIATION (PRMA) JOINING ICSE' MOTION  
IDENTIFYING PRELIMINARY LIST OF POTENTIAL WITNESSES TO TESTIFY AT  
HEARING OF THE 9019 MOTION

TO THE US DISTRICT JUDGE HONORABLE LAURA TAYLOR SWAIN:

NOW COME, the appearing parties represented by the undersigned counsel  
and respectfully allege and pray:

1. The Honorable Court on May 22, 2019, entered Order Extending and  
Establishing Deadlines Applicable to the Joint Motion of Puerto Rico Electric Power

Authority and AAFAF Pursuant to Bankruptcy Code Sections 362, 502, 922, and 928, and Bankruptcy Rules 3012 (A)(1) and 9019 for Order Approving Settlements Embodied in the Restructuring Support Agreement [ECF No. 1235]. (Docket #1253).

2. The appearing parties are all private, not for profit entities, which represent literally thousands of Puerto Rico's electricity consumers, industrial, commercial and residential, who have actively participated in Energy related cases during the last 5 years.

The appearing parties have litigated in front of the Puerto Rico Energy Commission (now PR Energy Bureau) in the state Courts, both First Instance and Appeal. Some of the cases have been removed to the Federal Court Promesa proceedings.

3. The appearing parties vehemently oppose the RSA for it is contrary to applicable laws, contrary to PREPA's own fiscal situation and contrary to legislated applicable Commonwealth of Puerto Rico Public Policy.

4. The appearing parties are interested in participating in the 9019 motion hearing set for July 24, 2019 and present the following witnesses:

A. Mr. Josen Rossi, Chairman of the Board ICSE; or Vice Chairman, Mr. José Rafael Fernández or Board of Directors Member Juan Larrea and/or members of the Boards of the specific entities. These Board Members can be reached through the undersigned attorney.

The Board Member will testify on what is ICSE or the specific entity their participation in debates and cases concerning Energy issues, the impact

of the RSA on Puerto Rico's Economy, and on the public interest they represent.

- B. Executive Director of ICSE, Eng. Tomas Torres. Will testify on what is ICSE, its prior participation on energy issues and cases; why ICSE opposes the RSA as contrary to public policies, laws, and the negative impact on the economy of Puerto Rico. Mr. Torres can be reached though the undersigned attorney.
- C. Dr. Ramon Cao, PHD in economics, will testify on the economic consequences of the increase in electric energy rates caused by the RSA Securitization. Dr. Cao can be reached through the undersigned attorney.
- D. Adversary Witnesses Eli Diaz and José Ortiz, Chairman of the Board and Executive Director of PREPA will testify on the content of the RSA, the economic, public policy and legal issues considered too reach the RSA and the consequences on PREPA's finances.

WHEREFORE it is requested from this Honorable Court to receive this submitted information of potential witnesses.

CERTIFICATE OF SERVICE I hereby certify that, on this same date, I filed this document electronically with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to all parties of record and CM/ECF participants in this case.

RESPECTFULLY SUBMITTED this 31<sup>th</sup>, day of May, 2019, in San Juan,  
Puerto Rico.

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